



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

LJF:RMT  
F.#2006R00642

*271 Cadman Plaza East  
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September 28, 2010

By Hand and ECF

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By U.S. Mail and ECF

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Re: United States v. Raghunath, et al.  
Criminal Docket No. 10-70 (JBW)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes the following discovery with respect to the above-referenced matter. This production supplements the government's April 12, 2010, May 28, 2010, June 7, 2010, June 10, 2010, June 21, 2010, June 28, 2010, July 1, 2010, July 29, 2010 and September 14, 2010 disclosures.

Enclosed is one compact disc, containing the following records and other documents relevant to the above-referenced matter: (a) copies of certain bank records, bearing Bates numbers F000000001 to F000000078; (b) a copy of an FBI report summarizing statements made by the defendant Halal Ahmed during a proffer on May 4, 2010, as well as the proffer agreement signed on that date, bearing Bates numbers F000000079 to F000000082; (c) copies of FBI reports summarizing statements made by the defendant Ishwardat Raghunath during proffers on August 26, 2010 and September 2, 2010, as well as the proffer agreements signed on

those dates, bearing Bates numbers F000000083 to F000000096; and (d) copies of recorded telephone calls made by Raghunath from the Brooklyn, New York Metropolitan Detention Center.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

LORETTA E. LYNCH  
United States Attorney

By: /s/  
Richard M. Tucker  
Assistant United States Attorney  
(718) 254-6204

Enclosure

cc: Clerk of the Court (JBW) (w/o enclosure)